



EAST KENTUCKY POWER COOPERATIVE

January 12, 2006

HAND DELIVERED

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602

RECEIVED

JAN 12 2006

PUBLIC SERVICE  
COMMISSION

Re: East Kentucky Power Cooperative, Inc. 2006  
Integrated Resource Plan

Dear Ms. O'Donnell:

Case No. 2006-00017

Please find enclosed for filing with the Commission an original and ten copies of the Motion of East Kentucky Power Cooperative, Inc., for a Waiver of the Integrated Resource Plan Filing Schedule.

Very truly yours,

Charles A. Lile  
Senior Corporate Counsel

Enclosures

Cc: Service List.

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JAN 12 2006

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE 2006 INTEGRATED RESOURCE PLAN OF ) CASE NO. 2006-00017  
EAST KENTUCKY POWER COOPERATIVE, INC. )

MOTION OF EAST KENTUCKY POWER COOPERATIVE, INC.,  
FOR A WAIVER OF THE INTEGRATED RESOURCE PLAN  
FILING SCHEDULE

East Kentucky Power Cooperative, Inc., ("EKPC") hereby moves the Kentucky Public Service Commission (the "Commission"), pursuant to 807 KAR 5:058 Section 3, for a waiver of the filing schedule for EKPC's 2006 Integrated Resource Plan ("IRP"), as specified in 807 KAR 5:058 Section 2. As grounds for this Motion, EKPC states as follows:

1. EKPC's Resource Planning Team has responded to an unprecedented demand for its services in the past year. With limited staff, Resource Planning developed studies, information and analyses for two generation construction certificate cases that went before the Commission in 2005, and supplied supplemental information, as needed in the course of those cases. The planning staff was also involved in studies related to Warren RECC membership in EKPC, studies critical to EKPC's litigation with the federal Environmental Protection Agency, the development of information associated with the regulatory requirements of the Energy Information Administration and the Rural Utilities Service, and other major non-routine projects, in addition to its more normal tasks, such as the on-going evaluation of potential future power supply options and the cost to serve new loads, the annual development of EKPC's financial forecast, and the conducting of

numerous other miscellaneous studies required by the business needs of various EKPC functions.

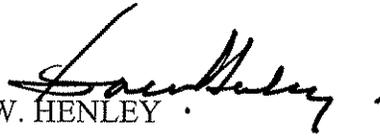
2. Due to a retirement and a resignation, the Resource Planning Team was down to two staff members during the first half of 2005, and one staff member during the latter half of 2005. A reorganization and consolidation of EKPC various planning functions, including the Resource Planning Team, is currently under consideration, and the hiring of additional planning staff may be delayed until the completion of that reorganization. It is currently unclear how soon this review will be completed, so that additional staffing needs can be evaluated.

3. Even with these unusual demands on limited staff, some work has been done on the 2006 IRP. Preliminary optimization studies have been done to develop a new expansion plan, based on the types of capacity resources EKPC currently plans to add to the system. However, a more thorough screening of options, and consideration of demand side programs and environmental regulations, need to be done. Information that is necessary for such additional analysis is currently under development, but it may not be possible to complete these tasks in time to file the IRP by the scheduled date.

4. Given EKPC's limited Resource Planning staff and their continuing heavy workload, EKPC requests an extension of the scheduled IRP filing date from April 21, 2006 to October 21, 2006. This extension should allow for proper completion of the IRP, and will also allow the incorporation into the IRP of EKPC's new load forecast, which is scheduled for completion in the late summer of 2006.

WHEREFORE, EKPC respectfully moves the Commission for a waiver from 807 KAR 5:058 Section 2, to allow EKPC to file its 2006 IRP by October 21, 2006.

Respectfully submitted,

  
DALE W. HENLEY

  
CHARLES A. LILE

ATTORNEYS FOR EAST  
KENTUCKY  
POWER COOPERATIVE, INC.  
P. O. BOX 707  
WINCHESTER, KY 40392-0707  
(859) 744-4812

**CERTIFICATE OF SERVICE**

This is to certify that an original and ten copies of the foregoing Motion of East Kentucky Power Cooperative, Inc. for a Waiver of the Integrated Resource Plan Filing Schedule, were delivered to Elizabeth O'Donnell, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601, and copies were mailed to: Honorable Elizabeth E. Blackford, Assistant Attorney General, Office of the Attorney General, Utility & Rate Intervention Division, 1024 Capital Center Drive, Suite 200, Frankfort, KY 40601-8204; Honorable Michael L. Kurtz, Boehm, Kurtz & Lowry, 36 East Seventh Street, Suite 1510, Cincinnati, OH 45202; and Honorable Iris Skidmore, Office of Legal Services, Natural Resources and Environmental Protection Cabinet, Division of Energy, 5th Floor, Capital Plaza Tower, 500 Mero Street, Frankfort, KY 40601, on January 12, 2006.



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CHARLES A. LILE